

# PUBLIC SUBMISSION

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**Docket:** EBSA-2010-0018

Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services Under the Patient Protection and Affordable Care Act

**Comment On:** EBSA-2010-0018-0002

Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services under Patient Protection and Affordable Care Act: Amendment

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Comment on FR Doc # 2011-19684

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## Submitter Information

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## General Comment

I am a member of the Board of Trustees of St. Joseph Hospital, Orange, CA--a hospital within the system of St. Joseph Health System which includes healthcare entities in California and Texas. I reject a definition of a "religious employer" offering group health insurance WHICH DOES NOT COVER THE HOSPITAL ON WHOSE BOARD I SERVE OR THE SYSTEM WHICH OVERSEES THE HEALTHCARE ORGANIZATIONS IN ITS SYSTEM. The St. Joseph Health System, a legal and canonical entity and its member healthcare service organizations should not be required to provide healthcare to "all approved contraceptive methods, sterilization procedures and counseling" which is in direct opposition to key beliefs and values of Roman Catholicism, of the sponsoring organization of the St. Joseph Health System and its member healthcare entities. The definition of "religious employer" included in HHS Interim Final Rule should correctly reflect the reality of "religious employers" which offer group health insurance as an expression of Roman Catholic services to people and to the country AND the unchanged/unchanging conviction of Roman Catholics that life is sacred, that "all approved contraceptive methods, sterilization methods, and counseling"--exceeds and therefore should not apply to this System, to its hospitals, and to other systems and hospitals which are also Roman Catholic.